

Mark H. Ralston
State Bar No. 16489460
Fishman Jackson Ronquillo PLLC
Three Galleria Tower
13155 Noel Road, Suite 700
Dallas, TX 75240
Telephone: (972) 419-5544
Facsimile: (972) 419-5500
E-mail: mrals@fjrpllc.com

Counsel for Province, Inc.,
Plan Administrator

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CASE NO 18-33678
	§	
TACO BUENO RESTAURANTS, INC., et al.,	§	Chapter 11
	§	
Debtors.¹	§	(Jointly Administered)
	§	
	§	

**MOTION FOR SETTING AND
REQUEST FOR EXPEDITED HEARING**

Province, Inc., in its capacity as Plan Administrator (the “**Plan Administrator**”), requests that a hearing be set on its *Motion to Amend Approved Claims Report and Authorize Related Distributions* [Doc 415] (the “**Motion**”) on an emergency basis. For cause, the Plan Administrator would show as follows:²

1. By the Motion, the Plan Administrator seeks this Court’s approval of the Revised Claims Schedule, which provides for certain revisions to be made to the Approved Claims

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: CBI Restaurants, Inc. (3490); Taco Bueno Equipment Company (0677); Taco Bueno Franchise Company L.P. (2397); Taco Bueno Restaurants, Inc. (8214); Taco Bueno Restaurants L.P. (6189); Taco Bueno West, Inc. (6200); TB Corp. (8535); TB Holdings II, Inc. (7703); TB Holdings II Parent, Inc. (3347); and TB Kansas LLC (6158).

² All capitalized terms not otherwise defined herein shall have the same meaning as defined, either directly or by reference, in the Motion.

Schedule. Those revisions are necessary to address, among other things, certain unintended omissions from the Approved Claims Schedule.

2. Hearing on an emergency basis is warranted because the requested changes to the Approved Claims Schedule are minimal in nature, are not controversial or otherwise likely to be contested, and will accelerate distributions to holders of allowed Opt-In Claims.

3. As indicated in the Certificate of Conference below, the trial attorney for the Office of the United States Trustee assigned to this case has informed the undersigned counsel that the Office of the United States Trustee does not oppose the requested emergency setting.

4. The Plan Administrator shall provide notice to parties of any emergency hearing scheduled by this Court by notice filed with the Court Management/Electronic Case Files system. Such notice should be sufficient because service will be immediately effectuated on the Office of the United States Trustee and all creditors that have appeared in this case.

Dated: the 2nd day of January 2020.

Respectfully submitted,

FISHMAN JACKSON RONQUILLO PLLC

/s/ Mark H. Ralston
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Dallas, TX 75240
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E-mail: mrals@fjrpllc.com

COUNSEL FOR PROVINCE, INC.,
PLAN ADMINISTRATOR

CERTIFICATE OF CONFERENCE

I hereby certify that on December 31, 2019, Stephen McKitt, trial attorney for the Office of the United States Trustee, communicated to me that his office did not oppose the relief requested herein.

/s/ Mark H. Ralston
Mark H. Ralston

CERTIFICATE OF SERVICE

This is to certify that the undersigned caused a true and correct copy of the foregoing document to be served on all persons receiving electronic notice of filings in this case through the ECF system, on this, the 2nd day of January 2020.

/s/ Mark H. Ralston
Mark H. Ralston